

Battaglia, Frank

From: Brolowski, Navpreet <nbrolowski@cecinc.com>
Sent: Wednesday, October 25, 2017 9:56 AM
To: Crawford, Jeffrey (DEM)
Cc: kelly.owens.dem.ri.gov; Roy, Craig (DEM); Battaglia, Frank; Joseph F Guarnaccia; Maxwell, Steve; Kitchen, Jonathan
Subject: RE: [EXTERNAL] : RE: BASF- former Ciba Geigy facility, Cranston (Revised Supplemental Study work Plan)

Good morning Jeff,

As we discussed yesterday, in our previous response to DEM comments (submitted 10/12/2017) we have included two monitoring wells (P-2S and MW-2S) which are located in the overburden and DLA (the middle zone) and are in the vicinity of P-002D, east of IJ-1S/1D. Based on our discussions yesterday, our understanding is that DEM's request below is fulfilled and no further additions to the revised Workplan dated October 12, 2017 are needed.

Best Regards,
Navpreet

Navpreet P. Brolowski, PE*, LSP / Project Manager
Civil & Environmental Consultants, Inc.
31 Bellows Road · Raynham, MA 02767
Office: (774) 409-2706 · Fax: (774) 501-2669
Cell: (267) 275-7082
<http://www.cecinc.com>
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*Licensed Professional Engineer in Massachusetts and Maryland

From: Crawford, Jeffrey (DEM) [mailto:jeff.crawford@dem.ri.gov]
Sent: Tuesday, October 17, 2017 8:40 AM
To: Brolowski, Navpreet <nbrolowski@cecinc.com>
Cc: Owens, Kelly (DEM) <kelly.owens@dem.ri.gov>; Roy, Craig (DEM) <craig.roy@dem.ri.gov>; battaglia.frank@epa.gov; Joseph F Guarnaccia <joseph.guarnaccia@basf.com>; Maxwell, Steve <smaxwell@cecinc.com>; Kitchen, Jonathan <jkitchen@cecinc.com>
Subject: RE: [EXTERNAL] : RE: BASF- former Ciba Geigy facility, Cranston (Revised Supplemental Study work Plan)

Navpreet-

The Department has reviewed the revisions to the Supplemental Pilot Study Work Plan and your response letter. The Department concurs with the comment responses, but request that in addition to the new proposed nested wells (7s/7D) that you add one either intermediate well or shallow well in the vicinity of P-002D, east of W-1s/1D. This will provide additional data for the discontinuous leaky aquitard in this area. If this is acceptable, please respond as soon as possible so that I can draft your Pilot Study Approval.

Thanks, Jeff



From: Brolowski, Navpreet [<mailto:nbrolowski@cecinc.com>]

Sent: Thursday, October 12, 2017 5:23 PM

To: Crawford, Jeffrey (DEM) <jeff.crawford@dem.ri.gov>

Cc: Owens, Kelly (DEM) <kelly.owens@dem.ri.gov>; Roy, Craig (DEM) <craig.roy@dem.ri.gov>; battaglia.frank@epa.gov; Joseph F Guarnaccia <joseph.guarnaccia@basf.com>; Maxwell, Steve <smaxwell@cecinc.com>; Kitchen, Jonathan <jkitchen@cecinc.com>

Subject: [EXTERNAL] : RE: BASF- former Ciba Geigy facility, Cranston (Revised Supplemental Study work Plan)

Good afternoon Jeff,

In response to email below, please find attached pdfs of a Response to Comment letter and a revised Supplemental Pilot Study work plan. Please let me know if you have any questions.

Best Regards,
Navpreet

Navpreet P. Brolowski, PE*, LSP / Project Manager

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*Licensed Professional Engineer in Massachusetts and Maryland

From: Crawford, Jeffrey (DEM) [<mailto:jeff.crawford@dem.ri.gov>]

Sent: Friday, September 15, 2017 7:28 AM

To: Brolowski, Navpreet <nbrolowski@cecinc.com>

Cc: Owens, Kelly (DEM) <kelly.owens@dem.ri.gov>; Roy, Craig (DEM) <craig.roy@dem.ri.gov>; battaglia.frank@epa.gov; Joseph F Guarnaccia <joseph.guarnaccia@basf.com>

Subject: BASF- former Ciba Geigy facility, Cranston

Navpreet-

The Department has been reviewing the Supplemental Pilot Study Work Plan for Ciba Geigy RCRA Closure Project-Insitu Subsurface Ozone Injections by CEC for the former Ciba Geigy facility in Cranston, Rhode Island. A question has been raised concerning the proposed injection locations in the plan and the locations of the groundwater monitoring wells for post injection monitoring. It appears from the figures provided that there are not many monitoring wells, if any, located downgradient of the proposed injection wells. CEC makes the point within the work plan that site COCs may desorb from the soil and increase COC groundwater concentrations during treatment with ozone. The Department is concerned that the increased COC concentrations in groundwater could eventually impact the Pawtuxet River and that sufficient downgradient monitoring wells are not present to monitor for both the impacts to

groundwater and the river. Additionally, it appears that there is only one round of post injection groundwater monitoring proposed.

Please clarify and identify the locations of the monitoring wells to be sampled and whether or not additional downgradient monitoring wells are proposed for installation. Also, what is the plan for groundwater monitoring post pilot study?

Jeff Crawford